

EXHIBIT “A”

Radano & Lide

ATTORNEYS AT LAW

PAUL V. ORECCHIA (Designated Trial Counsel)

Attorney ID Number 029261993

MELVILLE D. LIDE, ESQUIRE

Attorney ID Number 003171980

Post Office Box 1477

Vineland, New Jersey 08362-1477

(856) 691-2500

Attorneys for Plaintiff

File No.: 6225-21

Plaintiff(s)	: SUPERIOR COURT OF NEW JERSEY
	: LAW DIVISION
CHARLES RITTER, General	: BURLINGTON COUNTY
Administrator and Administrator ad	:
Prosequendum of the Estate of his	:
daughter, ROCHELLE RITTER,	:
Deceased	:
	: DOCKET NO. BUR-L-
Defendant(s)	:
	:
	: Civil Action
ADDY BROTHERS, LLC., JOHN	: COMPLAINT
DOE EMPLOYER (a fictitious name),	: DESIGNATION OF TRIAL
and JACOB ADDY	: COUNSEL, DISCOVERY DEMANDS,
	: AND JURY DEMAND

Plaintiff, CHARLES RITTER, in his capacity as General Administrator and as Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, residing at 1701 Salem Road, in the Township of Burlington, County of Burlington, and State of New Jersey, by way of Complaint against Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, says:

FIRST COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, ADDY BROTHERS, LLC., and was traveling in a general northerly direction on Campus Drive, in the general vicinity

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of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, ADDY BROTHERS, LLC., is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence.

7. Plaintiff, CHARLES RITTER, has been duly qualified and appointed by the Surrogate of Burlington County to serve as the General Administrator of the Estate of his daughter, Rochelle Ritter, Deceased, and, in such capacity, brings this cause of action against Defendant, ADDY BROTHERS, LLC., under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, ADDY BROTHERS, LLC., for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

SECOND COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, JOHN DOE EMPLOYER (a fictitious name), and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

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3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, JOHN DOE EMPLOYER (a fictitious name), is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence.

7. Plaintiff, CHARLES RITTER, has been duly qualified and appointed by the Surrogate of Burlington County to serve as the General Administrator of the Estate of his daughter, Rochelle Ritter, Deceased, and, in such capacity, brings this cause of action against Defendant, JOHN DOE EMPLOYER (a fictitious name), under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, JOHN DOE EMPLOYER (a fictitious name), for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

THIRD COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Plaintiff, CHARLES RITTER, has been duly qualified and appointed by the Surrogate of Burlington County to serve as the General Administrator of the Estate of his daughter, Rochelle Ritter, Deceased, and, in such capacity, brings this cause of action against Defendant, JACOB ADDY, under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, JACOB ADDY, for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

FOURTH COUNT

1. Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby repeats and incorporates by this reference all of the allegations contained in the preceding Counts of this Complaint as if set forth at length herein.

2. The occurrence and resulting injuries hereinabove described were proximately caused by the concurrent negligence of Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY.

3. Under the circumstances hereinabove alleged, Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, are jointly and severally liable for the injuries and damages of which the Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, complains.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, jointly, severally, and in the alternative, for such sums as would reasonably and properly compensate him in her representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et

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seq., together with Funeral Expenses and such other relief that the Court may deem just.

FIFTH COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, ADDY BROTHERS, LLC., and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, ADDY BROTHERS, LLC., is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence, including the pecuniary losses suffered by the Decedent's children, Michael C. Wilkerson and Mercedes Wilkerson.

7. Plaintiff, CHARLES RITTER, in his capacity as General Administratrix of the Estate of Rochelle Ritter, Deceased, has been duly qualified and appointed by the surrogate of Burling County to serve as the Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, who is survived by her two children, Michael C. Wilkerson and Mercedes Wilkerson.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, ADDY BROTHERS, LLC., for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

SIXTH COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, JOHN DOE EMPLOYER (a fictitious name), and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, JOHN DOE EMPLOYER (a fictitious name), is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence, including the pecuniary losses suffered by the Decedent's children, Michael C. Wilkerson and Mercedes Wilkerson.

7. Plaintiff, CHARLES RITTER, in his capacity as General Administratrix of the Estate of Rochelle Ritter, Deceased, has been duly qualified and appointed by the surrogate of Burling County to serve as the Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, who is survived by her two children, Michael C. Wilkerson and Mercedes Wilkerson.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, JOHN DOE EMPLOYER (a fictitious name), for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

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SEVENTH COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Plaintiff, CHARLES RITTER, in his capacity as General Administratrix of the Estate of Rochelle Ritter, Deceased, has been duly qualified and appointed by the surrogate of Burling County to serve as the Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, who is survived by her two children, Michael C. Wilkerson and Mercedes Wilkerson.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, JACOB ADDY, for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

EIGHTH COUNT

1. Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby repeats and incorporates by this reference all of the allegations contained in the Fifth, Sixth and Seventh Counts of this Complaint as if set forth at length herein.

2. The occurrence and resulting injuries hereinabove described were proximately caused by the concurrent negligence of Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY.

3. Under the circumstances hereinabove alleged, Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, are jointly and severally liable for the injuries and damages of which the Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, complains.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

NOTICE PURSUANT TO RULES 1:5-1(a) and 4:17-4(c)

TAKE NOTICE that the undersigned attorneys for the Plaintiff, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby demand, pursuant to rules 1:5-1(a) and 4:17-4(c), that each party herein serving pleadings and Interrogatories and receiving answers thereto serve copies of all such pleadings and answered Interrogatories upon the undersigned attorneys and **TAKE NOTICE** that this is a continuing demand.

DATED: September 24, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, the undersigned attorneys for the Plaintiff, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby designate Paul V. Orecchia, Esquire, as Trial counsel.

DATED: September 24, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

DEMAND FOR JURY TRIAL

TAKE NOTICE that the Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity

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as Administrator as Prosequendum of he Estate of Rochelle Ritter, Deceased, hereby demand a Trial by Jury on all issues in accordance with the Rules of this Court.

DATED: September 24, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

DEMAND FOR INTERROGATORIES

TAKE NOTICE that, pursuant to New Jersey Court Rule 4:17-1, as Amended effective September 5, 2000, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of he Estate of Rochelle Ritter, Deceased, hereby demand that Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, provide Answers to "Uniform Interrogatories Form C and C(2)" within the sixty (60) day time period prescribed by the New Jersey Court Rules.

DATED: September 24, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

**DEMAND FOR DISCOVERY OF INSURANCE
COVERAGE INFORMATION**

PLEASE TAKE NOTICE that the undersigned attorney for the Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of he Estate of Rochelle Ritter, Deceased, hereby demand that Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, hereby demand that all Defendants produce complete copies of any and all Motor Vehicle liability insurance policies that were in effect at the time of the March 13, 2021, motor vehicle accident. This request includes, but is not limited to, the declaration sheet, the actual policy and any and all endorsements to the policy. This demand can be complied with by sending certified complete copies of the applicable policies to the undersigned attorney for the Plaintiff within 50 days of the Service of the Complaint, or alternatively, by producing the original of said policy at the office of the undersigned attorney at 10:00 a.m. on the foregoing date.

DATED: September 24, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

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NOTICE TO PRODUCE DOCUMENTS

PLEASE TAKE NOTICE that, pursuant to Rule 4:18-1, we hereby request that you produce at the offices of Radano & Lide, within thirty-five (35) days of the filing of an Answer to the Complaint and permit the party making this request to inspect and copy the following designated documents and things; or, in the alternative, respond by providing such items by mail prior thereto:

1) Copies of all photographs or videotapes of the parties involved, vehicles involved, the scene of the accident or any other relevant photographs or videotapes in possession of Defendant(s) or their attorneys, representatives or insurance carrier.

2) Copies of any diagrams, reports, floor plans, sketches, architect s renderings, or other schematic prepared by police, investigators, the parties or any other person.

3) Copies of any and all medical record(s) of Plaintiff obtained by you or your representatives from sources other than Plaintiff in the course of Discovery or investigation.

4) Copies of any and all statements of the parties to this lawsuit, written or oral, including but not limited to electronic notations, log notes, computer records, records, or other documentation memorializing statements of parties or conversations with any party of this lawsuit.

5) A copy of the report(s) of any expert upon which will rely, setting forth the facts and opinions to which the expert is expected to testify, the summary of grounds for each opinion and a copy of the current curriculum vitae of said expert.

6) Any and all exhibits and documentary evidence which may be used at Trial.

7) A copy of any CIB or other claim index pertaining to report to Plaintiff which has been obtained by you or anyone acting on your behalf.

8) Any and all transcripts, reports or documents in your possession which could be used in cross examination of Plaintiff s experts at Trial, or which you are in possession of, whether or not you intend to use them at Trial.

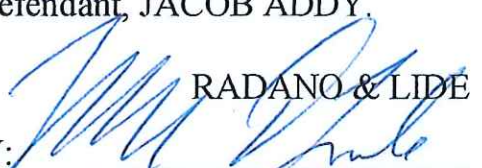
9) Name and address of the Defendant driver's employer at the time of the March 13, 2021, collision.

10) A copy of the Driver's License of Defendant, JACOB ADDY.

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DATED: September 24, 2021

BY:


RADANO & LIDE
MELVILLE D. LIDE

CERTIFICATION IN ACCORDANCE WITH RULE 4:5-1

Pursuant to Rule 4:5-1, it is hereby certified that, to the best of my knowledge, there are no other pending actions or proceedings involving the matter

in controversy; none are contemplated and I do not presently know the identity of any other party who should be joined, except that I am aware that investigation is continuing with respect to potentially responsible parties and such investigation necessarily requires access to the file of the Burlington County Prosecutor.

DATED: September 24, 2021

BY:


RADANO & LIDE
MELVILLE D. LIDE

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Civil Case Information Statement

Case Details: BURLINGTON | Civil Part Docket# L-002043-21

Case Caption: RITTER CHARLES VS ADDY BROTHERS, LLC.

Case Initiation Date: 09/27/2021

Attorney Name: MELVILLE D LIDE

Firm Name: RADANO & LIDE

Address: 78 WEST PARK AVE - STE 2 P.O. BOX 1477
VINELAND NJ 08360

Phone: 8566912500

Name of Party: PLAINTIFF : RITTER, CHARLES

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: CHARLES RITTER? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

09/27/2021
Dated

/s/ MELVILLE D LIDE
Signed

EXHIBIT “B”

Radano & Lide

ATTORNEYS AT LAW

PAUL V. ORECCHIA (Designated Trial Counsel)

Attorney ID Number 029261993

MELVILLE D. LIDE, ESQUIRE

Attorney ID Number 003171980

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Attorneys for Plaintiff

File No.: 6225-21

Plaintiff(s)

: SUPERIOR COURT OF NEW JERSEY

: LAW DIVISION

: BURLINGTON COUNTY

CHARLES RITTER, General

Administrator and Administrator ad

Prosequendum of the Estate of his

daughter, ROCHELLE RITTER,

Deceased

: DOCKET NO. BUR-L-2043-21

Defendant(s)

: ***Civil Action***

ADDY BROTHERS, LLC., JOHN

: AMENDED COMPLAINT,

DOE EMPLOYER (a fictitious name),

: OFFER TO TAKE JUDGMENT

JACOB ADDY, and

: and JURY DEMAND

AMAZON.COM, INC.

:

Plaintiff, CHARLES RITTER, in his capacity as General Administrator and as Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, residing at 1701 Salem Road, in the Township of Burlington, County of Burlington, and State of New Jersey, by way of Amended Complaint against Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., says:

FIRST COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

Radano & Lide

ATTORNEYS AT LAW

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2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, ADDY BROTHERS, LLC., and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, ADDY BROTHERS, LLC., is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence.

7. Plaintiff, CHARLES RITTER, has been duly qualified and appointed by the Surrogate of Burlington County to serve as the General Administrator of the Estate of his daughter, Rochelle Ritter, Deceased, and, in such capacity, brings this cause of action against Defendant, ADDY BROTHERS, LLC., under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, ADDY BROTHERS, LLC., for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

SECOND COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection

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with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, JOHN DOE EMPLOYER (a fictitious name), and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, JOHN DOE EMPLOYER (a fictitious name), is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence.

7. Plaintiff, CHARLES RITTER, has been duly qualified and appointed by the Surrogate of Burlington County to serve as the General Administrator of the Estate of his daughter, Rochelle Ritter, Deceased, and, in such capacity, brings this cause of action against Defendant, JOHN DOE EMPLOYER (a fictitious name), under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, JOHN DOE EMPLOYER (a fictitious name), for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

THIRD COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Plaintiff, CHARLES RITTER, has been duly qualified and appointed by the Surrogate of Burlington County to serve as the General Administrator of the Estate of his daughter, Rochelle Ritter, Deceased, and, in such capacity, brings this cause of action against Defendant, JACOB ADDY, under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, JACOB ADDY, for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

FOURTH COUNT

1. Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby repeats and incorporates by this reference all of the allegations contained in the First and Third Counts of this Amended Complaint as if set forth at length herein.

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2. At the time of the pedestrian/motor vehicle collision hereinabove described, Defendant, ADDY BROTHERS, LLC. and JACOB ADDY, were acting in the course and scope of an agency relationship for Defendant, AMAZON.COM, INC.

3. Under the terms of the agency relationship hereinabove described, Defendant, AMAZON.COM, INC., maintained a high degree of control and/or right of control over the precise details of the package delivery process and, under the circumstances herein described, Defendant, AMAZON.COM, INC., is vicariously responsible and liable for the conduct of Defendants, ADDY BROTHERS, LLC. and JACOB ADDY.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, AMAZON.COM, INC., for such sums as would reasonably and properly compensate him in his representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

FIFTH COUNT

1. Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby repeats and incorporates by this reference all of the allegations contained in the preceding Counts of this Amended Complaint as if set forth at length herein.

2. The occurrence and resulting injuries hereinabove described were proximately caused by the concurrent negligence of Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC..

3. Under the circumstances hereinabove alleged, Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., are jointly and severally liable for the injuries and damages of which the Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, complains.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., jointly, severally, and in the alternative, for such sums as would reasonably and properly compensate him in her representative capacity under the New Jersey Survivorship Act, N.J.S.A 2A:15-3, et seq., together with Funeral Expenses and such other relief that the Court may deem just.

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SIXTH COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, ADDY BROTHERS, LLC., and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, ADDY BROTHERS, LLC., is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence, including the pecuniary losses suffered by the Decedent's children, Michael C. Wilkerson and Mercedes Wilkerson.

7. Plaintiff, CHARLES RITTER, in his capacity as General Administratrix of the Estate of Rochelle Ritter, Deceased, has been duly qualified and appointed by the surrogate of Burling County to serve as the Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, who is survived by her two children, Michael C. Wilkerson and Mercedes Wilkerson.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, ADDY BROTHERS, LLC., for such sums as would reasonably compensate him, in his representative capacity, under

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the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

SEVENTH COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle, in the course and scope of his employment or other agency relationship for Defendant, JOHN DOE EMPLOYER (a fictitious name), and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Under the circumstances hereinabove described, Defendant, JOHN DOE EMPLOYER (a fictitious name), is vicariously responsible and liable for the negligence of Defendant, JACOB ADDY, and for the injuries and other damages which have resulted from such negligence, including the pecuniary losses suffered by the Decedent's children, Michael C. Wilkerson and Mercedes Wilkerson.

7. Plaintiff, CHARLES RITTER, in his capacity as General Administratrix of the Estate of Rochelle Ritter, Deceased, has been duly qualified and appointed by the surrogate of Burling County to serve as the Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, who is survived by her two children, Michael C. Wilkerson and Mercedes Wilkerson.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby

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requests the entry of Judgment against Defendant, JOHN DOE EMPLOYER (a fictitious name), for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

EIGHTH COUNT

1. On the morning of Saturday, March 13, 2021, Rochelle Ritter, was a pedestrian and was walking on Campus Drive, in the vicinity of its intersection with Sunset Road, in the Township of Burlington, County of Burlington, and State of New Jersey.

2. At the time and place hereinabove described, Defendant, JACOB ADDY, was operating a motor vehicle and was traveling in a general northerly direction on Campus Drive, in the general vicinity of its intersection with Sunset Road, in the Township of Burlington, situated as hereinabove described.

3. At the above time and place, Defendant, JACOB ADDY, so negligently operated the motor vehicle he was driving as to cause that motor vehicle to violently strike the pedestrian, Rochelle Ritter.

4. The negligence of Defendant, JACOB ADDY, included, inter alia, the follow acts and/or omissions: (a) failing to make proper observations, (b) failing to yield to right of way to a pedestrian in the road way, (c) failing to properly operate the braking device on the vehicle, (d) failing to properly operate the steering wheel on the vehicle (e) failing to have his vehicle under full and complete control at all times, and (f) otherwise failing to exercise due care for the safety of Rochelle Ritter and other persons in the area.

5. As a further direct and proximate result of the negligence of Defendant, JACOB ADDY, and the occurrence hereinabove described, Rochelle Ritter was caused to suffer catastrophic injuries, resulting in her untimely death on the morning of Saturday, March 13, 2021.

6. Plaintiff, CHARLES RITTER, in his capacity as General Administratrix of the Estate of Rochelle Ritter, Deceased, has been duly qualified and appointed by the surrogate of Burling County to serve as the Administrator ad Prosequendum of the Estate of his Daughter, Rochelle Ritter, Deceased, who is survived by her two children, Michael C. Wilkerson and Mercedes Wilkerson.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, JACOB ADDY, for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

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NINTH COUNT

1. Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby repeats and incorporates by this reference all of the allegations contained in the Sixth and Eighth Counts of this Amended Complaint as if set forth at length herein.

2. At the time of the pedestrian/motor vehicle collision hereinabove described, Defendant, ADDY BROTHERS, LLC. and JACOB ADDY, were acting in the course and scope of an agency relationship for Defendant, AMAZON.COM, INC.

3. Under the terms of the agency relationship hereinabove described, Defendant, AMAZON.COM, INC., maintained a high degree of control and/or right of control over the precise details of the package delivery process and, under the circumstances herein described, Defendant, AMAZON.COM, INC., is vicariously responsible and liable for the conduct of Defendants, ADDY BROTHERS, LLC. and JACOB ADDY.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendant, AMAZON.COM, INC., for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

TENTH COUNT

1. Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby repeats and incorporates by this reference all of the allegations contained in the Sixth, Seventh Eighth and Ninth Counts of this Amended Complaint as if set forth at length herein.

2. The occurrence and resulting injuries hereinabove described were proximately caused by the concurrent negligence of Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY.

3. Under the circumstances hereinabove alleged, Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) and JACOB ADDY, are jointly and severally liable for the injuries and damages of which the Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, complains.

WHEREFORE, Plaintiff, CHARLES RITTER, in his capacity as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby requests the entry of Judgment against Defendants, ADDY BROTHERS, LLC.,

JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., for such sums as would reasonably compensate him, in his representative capacity, under the New Jersey Wrongful Death Act, N.J.S.A 2A:31-1, et seq, including a claim for funeral expenses and such other relief as the Court may deem just,

NOTICE PURSUANT TO RULES 1:5-1(a) and 4:17-4(c)

TAKE NOTICE that the undersigned attorneys for the Plaintiff, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby demand, pursuant to rules 1:5-1(a) and 4:17-4(c), that each party herein serving pleadings and Interrogatories and receiving answers thereto serve copies of all such pleadings and answered Interrogatories upon the undersigned attorneys and **TAKE NOTICE** that this is a continuing demand.

DATED: December 1, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, the undersigned attorneys for the Plaintiff, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby designate Paul V. Orecchia, Esquire, as Trial counsel.

DATED: December 1, 2021

BY:  RADANO & LIDE
MELVILLE D. LIDE

OFFER TO TAKE JUDGMENT

PLEASE TAKE NOTICE that pursuant to Rule 4:58-1, the Plaintiff, CHARLES RITTER, in his capacity as General Administrator and as Administrator ad Prosequendum of the Estate of Rochelle Ritter, Deceased, offers to take a Judgment against Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., jointly severally and in the alternative, in the amount of \$1,000,000.00 (One Million Dollars), without prejudice, with costs accrued to date hereof.

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PLEASE TAKE FURTHER NOTICE that if this Offer to Take Judgment is not timely accepted in accordance with R. 4:58-1, et seq., an application may be made for all reasonable litigation expenses incurred following such non-acceptance, interest at 8% (or prevailing rate), attorneys' fees, and costs.

DATED: December 1, 2021

BY: 

RADANO & LIDE

MELVILLE D. LIDE

DEMAND FOR JURY TRIAL

TAKE NOTICE that the Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby demand a Trial by Jury on all issues in accordance with the Rules of this Court.

DATED: December 1, 2021

BY: 

RADANO & LIDE

MELVILLE D. LIDE

DEMAND FOR INTERROGATORIES

TAKE NOTICE that, pursuant to New Jersey Court Rule 4:17-1, as Amended effective September 5, 2000, Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of the Estate of Rochelle Ritter, Deceased, hereby demand that Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., provide Answers to "Uniform Interrogatories Form C and C(2)" within the sixty (60) day time period prescribed by the New Jersey Court Rules.

DATED: December 1, 2021

BY: 

RADANO & LIDE

MELVILLE D. LIDE

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE INFORMATION

PLEASE TAKE NOTICE that the undersigned attorney for the Plaintiff, CHARLES RITTER, in his capacity as General Administrator of the Estate of Rochelle Ritter, Deceased, and in his capacity as Administrator as Prosequendum of

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he Estate of Rochelle Ritter, Deceased, hereby demand that Defendants, ADDY BROTHERS, LLC., JOHN DOE EMPLOYER (a fictitious name) JACOB ADDY and AMAZON.COM, INC., hereby demand that all Defendants produce complete copies of any and all Motor Vehicle liability insurance policies that were in effect at the time of the March 13, 2021, motor vehicle accident. This request includes, but is not limited to, the declaration sheet, the actual policy and any and all endorsements to the policy. This demand can be complied with by sending certified complete copies of the applicable policies to the undersigned attorney for the Plaintiff within 50 days of the Service of the Complaint, or alternatively, by producing the original of said policy at the office of the undersigned attorney at 10:00 a.m. on the foregoing date.

DATED: December 1, 2021

BY:

 RADANO & LIDE

MELVILLE D. LIDE

NOTICE TO PRODUCE DOCUMENTS

PLEASE TAKE NOTICE that, pursuant to Rule 4:18-1, we hereby request that you produce at the offices of Radano & Lide, within thirty-five (35) days of the filing of an Answer to the Complaint and permit the party making this request to inspect and copy the following designated documents and things; or, in the alternative, respond by providing such items by mail prior thereto:

- 1) Copies of all photographs or videotapes of the parties involved, vehicles involved, the scene of the accident or any other relevant photographs or videotapes in possession of Defendant(s) or their attorneys, representatives or insurance carrier.
- 2) Copies of any diagrams, reports, floor plans, sketches, architect s renderings, or other schematic prepared by police, investigators, the parties or any other person.
- 3) Copies of any and all medical record(s) of Plaintiff obtained by you or your representatives from sources other than Plaintiff in the course of Discovery or investigation.
- 4) Copies of any and all statements of the parties to this lawsuit, written or oral, including but not limited to electronic notations, log notes, computer records, records, or other documentation memorializing statements of parties or conversations with any party of this lawsuit.
- 5) A copy of the report(s) of any expert upon which will rely, setting forth the facts and opinions to which the expert is expected to testify, the summary

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of grounds for each opinion and a copy of the current curriculum vitae of said expert.

6) Any and all exhibits and documentary evidence which may be used at Trial.

7) A copy of any CIB or other claim index pertaining to report to Plaintiff which has been obtained by you or anyone acting on your behalf.

8) Any and all transcripts, reports or documents in your possession which could be used in cross examination of Plaintiff's experts at Trial, or which you are in possession of, whether or not you intend to use them at Trial.

9) Name and address of the Defendant driver's employer at the time of the March 13, 2021, collision.

10) A copy of the Driver's License of Defendant, JACOB ADDY.

DATED: December 1, 2021

BY:


RADANO & LIDE

MELVILLE D. LIDE

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EXHIBIT “C”

Radano & Lide

Attorneys at Law

78 West Park Avenue, Suite 2

Vineland, New Jersey 08360

(856) 691-2500

Fax: (856) 691-5574

Nicholas G. Radano ♦

Melville D. Lide

Michael J. Gaffney ♦ *

Paul V. Orecchia ♦

Kelly A. Dougherty

♦ *Member N.J. & D.C. Bar*

** Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney*

Post Office Box 1477

Vineland, New Jersey 08362-1477

505 New Road

Northfield, New Jersey 08225

(609) 926-6999

October 27, 2021

SENT VIA UPS

Please reply to: ☒ *Vineland*
 ☐ *Northfield*

Jacob Addy

631 Talcottville Road, Apt. M7

Vernon, CT 06066

Re: CHARLES RITTER, General Administrator and Administrator ad Prosequendum
of the Estate of his daughter, ROCHELLE RITTER, deceased vs. ADDY BROTHERS
LLC., JOHN DOE EMPLOYER (a fictitious name), and JACOB ADDY

Docket No: BUR-L-2043-21

Dear Jacob Addy:

Enclosed please find a copy of Summons, Complaint and Jury Demand which we are
herewith serving upon you. These suit papers are being served by UPS in accordance with
New Jersey Court Rule 4:4-4 (a).

Kindly acknowledge receipt of these materials by signing and returning the enclosed
Acknowledgment of Service in the envelope provided for this purpose.



Very truly yours,
RADANO & LIDE

MELVILLE D. LIDE

MDL/bp

Enclosures

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RADANO & LIDE			
STREET ADDRESS			
78 W PARK AVE RM STE 2			
CITY AND STATE		ZIP CODE	
VINELAND NJ		08360 3533	
EXTREMELY URGENT DELIVERY TO			
NAME		TELEPHONE	
Jacob Addy			
COMPANY			
Addy Brothers LLC			
STREET ADDRESS		DEPT./FLR.	Residential Delivery
631 Talcottville Rd. Apt M10			
CITY AND STATE		ZIP CODE	
VERNON, CT		06066	
			

3	WEIGHT	LTR <input checked="" type="checkbox"/>	WEIGHT	DIMENSIONAL WEIGHT If Applicable	LARGE PACKAGE <input type="checkbox"/>	4	SHIPPER RELEASE <input type="checkbox"/>	1+ 1+ +
5	NEXT DAY AIR EARLY CHARGE						\$	
6	OPTIONAL SERVICES		SATURDAY PICKUP See Instructions.		SATURDAY DELIVERY See Instructions.		\$	
	DECLARED VALUE FOR CARRIAGE For declared value over \$100, see instructions.		\$		AMOUNT		\$	
	C.O.D. If C.O.D. enter amount to be collected and attach completed UPS C.O.D. tag to package.		\$		AMOUNT		\$	
	VERBAL COMMUNICATION OF DELIVERY See Instructions.						\$	
7	ADDITIONAL HANDLING CHARGE		An Additional Handling Charge applies for certain items. See instructions.				\$	
TOTAL CHARGES								\$
8	METHOD OF PAYMENT		BILL SHIPPER'S ACCOUNT NUMBER <input checked="" type="checkbox"/> RECORD ACCOUNT NO. IN SECTION 9		BILL RECEIVER <input type="checkbox"/> BILL THIRD PARTY <input type="checkbox"/> CREDIT CARD <input type="checkbox"/> American Express Diner's Club MasterCard Visa		CHECK <input type="checkbox"/>	
9	RECEIVER'S/THIRD PARTY'S UPS ACCT. NO. OR MAJOR CREDIT CARD NO.						EXPIRATION DATE	
THIRD PARTY'S COMPANY NAME AND ADDRESS								
STREET ADDRESS								
CITY AND STATE								
ZIP CODE								
All shipments are subject to the terms contained in the UPS Tariff/Terms and Conditions of Service available at UPS.com and local UPS offices.								
10	SHIPPER'S SIGNATURE						DATE OF SHIPMENT	
0201911262609 11/15 RRD						SHIPPER'S COPY		

This form not needed with UPS Internet Shipping at UPS.com

11/24/21, 2:43 PM

Tracking | UPS - United States

Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number

1ZF122702110001164

Service

UPS Next Day Air Early

Delivered On

11/02/2021 7:31 A.M.

Delivered To

EAST HARTFORD, CT, US

Received By

DRIVER RELEASE

Left At

Front Door

Thank you for giving us this opportunity to serve you. Details are only available for shipments delivered within the last 120 days. Please print for your records if you require this information after 120 days.

Sincerely,

UPS

Tracking results provided by UPS: 11/24/2021 2:43 P.M. EST

Last Updated: 11/29/2021 10:01 A.M. EST

Shipment Details

Shipment Progress

11/02/2021 7:31 A.M.	Delivered DELIVERED EAST HARTFORD, CT, US
11/02/2021 6:48 A.M.	On the Way Departed from Facility Windsor Locks, CT, United States
11/01/2021 9:02 A.M.	The receiver has moved. We will deliver the package to the receiver's new address. Windsor Locks, CT, United States
11/01/2021 9:01 A.M.	The receiver has moved. We're attempting to obtain a new delivery address for this receiver. / The delivery information was updated in error. We've corrected the mistake. Windsor Locks, CT, United States
11/01/2021 9:00 A.M.	The receiver has moved. We're attempting to obtain a new delivery address for this receiver. Windsor Locks, CT, United States
11/01/2021 7:59 A.M.	The receiver has moved. We're attempting to obtain a new delivery address for this receiver. Windsor Locks, CT, United States
10/29/2021 8:11 A.M.	We missed you again. A final attempt will be made the next business day. Windsor Locks, CT, United States
10/29/2021 7:55 A.M.	The receiver was not available for delivery. We'll make a second attempt the next business day. Windsor Locks, CT, United States
10/29/2021 4:26 A.M.	Arrived at Facility Windsor Locks, CT, United States
10/29/2021 3:40 A.M.	Departed from Facility Philadelphia, PA, United States
10/28/2021 7:44 P.M.	Departed from Facility Vineland, NJ, United States
10/28/2021 7:34 P.M.	Origin Scan Vineland, NJ, United States
10/28/2021 6:23 P.M.	Pickup Scan Vineland, NJ, United States

Want to see more? With UPS My Choice® you can see your full shipment progress. [Sign Up Now](#)Already Enrolled? [Log In](#)

EXHIBIT “D”

Case Summary

Case Number: BUR L-002043-21

Case Caption: Ritter Charles Vs Addy Brothers Llc

Court: Civil Part

Venue: Burlington

Case Initiation Date: 09/27/2021

Case Type: Auto Negligence-Personal Injury (Non-Verbal Threshold)

Case Status: Active

Jury Demand: 6 Jurors

Case Track: 2

Judge: Richard L Hertzberg

Team: 4

Original Discovery End Date:

Current Discovery End Date:

of DED Extensions: 0

Original Arbitration Date:

Current Arbitration Date:

of Arb Adjournments: 0

Original Trial Date:

Current Trial Date:

of Trial Date Adjournments: 0

Disposition Date:

Case Disposition: Open

Statewide Lien:

Plaintiffs

Charles Ritter AKA Rochelle Ritter, Deceased

Party Description: Adm Ad Prsqndum

Attorney Name: Melville D Lide

Address Line 1:

Address Line 2:

Attorney Bar ID: 003171980

City: State: NJ

Zip: 00000

Phone:

Attorney Email: RADANO2500@RLINJURY.COM

Defendants

John Doe Employer AKA John Doe Employer (A Fictitious Name)

Party Description: Fictitious

Attorney Name:

Address Line 1:

Address Line 2:

Attorney Bar ID:

City: State: NJ

Zip: 00000

Phone:

Attorney Email:

Addy Brothers Llc

Party Description: Corp

Attorney Name:

Address Line 1:

Address Line 2:

Attorney Bar ID:

City: State: NJ

Zip: 00000

Phone:

Attorney Email:

Amazon.Com, Inc.

Party Description: Business

Attorney Name:

Address Line 1:

Address Line 2:

Attorney Bar ID:

City: State: NJ

Zip: 00000

Phone:

Attorney Email:

Jacob Addy

Party Description: Individual

Attorney Name:

Address Line 1:

Address Line 2:

Attorney Bar ID:

City: State: NJ

Zip: 00000

Phone:

Attorney Email:

Case Actions

Filed Date	Docket Text	Transaction ID	Entry Date
09/27/2021	Complaint with Jury Demand for BUR-L-002043-21 submitted by LIDE, MELVILLE D, RADANO & LIDE on behalf of CHARLES RITTER against ADDY BROTHERS, LLC., JOHN DOE EMPLOYER, JACOB ADDY	LCV20212241793	09/27/2021
09/28/2021	TRACK ASSIGNMENT Notice submitted by Case Management	LCV20212252914	09/28/2021
12/01/2021	AMENDED COMPLAINT submitted by LIDE, MELVILLE, D of RADANO & LIDE on behalf of CHARLES RITTER against AMAZON.COM, INC.	LCV20212799615	12/01/2021

EXHIBIT “E”

ADDY BROTHERS LLC ACTIVE

631 TALCOTTVILLE ROAD APARTMENT M7, VERNON, CT, 06066
BUSINESS DETAILS

Business Details

General Information

Business Name

ADDY BROTHERS LLC

Business status

ACTIVE

Citizenship/place of formation

Domestic/Connecticut

Business address

631 TALCOTTVILLE ROAD APARTMENT M7, VERNON, CT, 06066

Annual report due

10/24/2017

NAICS code

Business ALEI

0876922

Date formed

10/24/2006

Business type

LLC

Mailing address

631 TALCOTTVILLE ROAD APARTMENT M7, VERNON, CT, 06066

Last report filed

2016

BUSINESS DETAILS

Principal Details

Principal Name

JACOB ADDY

Principal Title

MEMBER

Principal Business address

631 TALCOTTVILLE ROAD, APARTMENT M7, VERNON, CT, 06066, United States

Principal Residence address

631 TALCOTTVILLE ROAD, APARTMENT M7, VERNON, CT, 06066, United States

Agent details

Agent name

JACOB ADDY

Agent Business address

631 TALCOTTVILLE RD, APT M7, VERNON, CT, 06066, United States

Agent Residence addresss

631 TALCOTTVILLE RD , APT M7, VERNON, CT, 06066, United States

Filing History



Business Formation - Certificate of Organization

0003320530

Filing date: 10/24/2006

Volume Type

B

Volume

BUSINESS DETAILS

Start page

1496

Pages

1

Date generated

10/24/2006



Annual Report(2007)

0003558820

Filing date: 10/17/2007

Volume Type

B

Volume

1093

Start page

3126

Pages

2

Date generated

10/17/2007



Interim Notice - Interim Notice

0003635916

Filing date: 2/27/2008

Volume Type

B

Volume

1132

Start page

BUSINESS DETAILS

Pages

1

Date generated

2/27/2008



Annual Report(2008)

0003801817

Filing date: 10/16/2008

Volume Type

B

Volume

1218

Start page

3544

Pages

2

Date generated

10/16/2008



Annual Report(2009)

0004049439

Filing date: 11/5/2009

Volume Type

B

Volume

1346

Start page

2256

Pages

BUSINESS DETAILS

Date generated

11/5/2009



Annual Report(2010)

0004280281

Filing date: 10/28/2010

Volume Type

B

Volume

1469

Start page

2835

Pages

2

Date generated

10/28/2010



Annual Report(2011)

0004638249

Filing date: 10/14/2011

Volume Type

B

Volume

1674

Start page

3552

Pages

2

Date generated

BUSINESS DETAILS



Annual Report(2012)

0004768709

Filing date: 12/21/2012

Volume Type

B

Volume

1749

Start page

1662

Pages

2

Date generated

12/21/2012



Interim Notice - Interim Notice

0004792739

Filing date: 1/18/2013

Volume Type

B

Volume

1762

Start page

2893

Pages

2

Date generated

1/18/2013

BUSINESS DETAILS
Annual Report(2013)



0004946528

Filing date: 9/21/2013

Volume Type

B

Volume

1849

Start page

2975

Pages

2

Date generated

9/21/2013



Annual Report(2014)

0005192218

Filing date: 9/30/2014

Volume Type

B

Volume

1987

Start page

1016

Pages

2

Date generated

9/30/2014



Annual Report(2015)

0005667996

BUSINESS DETAILS
Filing date: 10/6/2016

Volume Type

B

Volume

2252

Start page

2792

Pages

2

Date generated

10/6/2016



Annual Report(2016)

0005668002

Filing date: 10/6/2016

Volume Type

B

Volume

2252

Start page

2803

Pages

2

Date generated

10/6/2016

Name History



None

BUSINESS DETAILS

Shares



None

EXHIBIT “F”

Amazon Headquarters, All Office Locations and (<https://headquartersoffice.com/>) Addresses

Everything you need to know about (NASDAQ: AMZN) Amazon.com

X

Amazon is an online shopping store that is guided by four principles namely, customer obsession over competitor focus, passion for invention, commitment to operational excellence, and long-term thinking. The company strives to give a positive impact not just on the customers and employees but to small businesses, economy, and the communities as well. The whole Amazon team share the same values of being smart and passionate in building and inventing more for customers despite the disparity in each individual's personal background.

In the venture of health care benefits, a lawsuit and allegations made by the UnitedHealth Group try to pry on the secretive plans of the three most powerful corporations: Amazon, Berkshire Hathaway, and JPMorgan Chase. Despite the allegation, Amazon remain firm and unmoved in the stock market.

General information

Post Contents

[show]

X

HQ:	2111 7th Ave, Seattle, WA 98121, United States
Zip Code:	98121
Traded as:	NASDAQ: AMZN (https://www.google.com/search?q=NASDAQ:+AMZN&stick=H4slAAAAAAAAAONgecRoyi3w8sc9YSmdSWIKzsgvd80rySypFJLgYoOy-KR4uLj0c_UNzKtyLA2yeQDDppNiOgAAAA&tbm=fin#scso=_4Lc2X_jhJ82I-oBQ1:0)
ISIN: (International Securities Identification Number)	US0231351067 (https://isin.toolforge.org/?language=en&isin=US0231351067)
Industry:	Cloud computing, e-commerce, artificial intelligence, consumer electronics, distribution, and self-driving cars.
Founded:	July 5, 1994 in Bellevue, Washington, United States
Founders:	Jeff Bezos (https://en.wikipedia.org/wiki/Jeff_Bezos)
Products:	Echo, Fire Tablet, Fire TV, Fire OS, Kindle
Services:	Amazon.com, Amazon Alexa, Amazon Appstore, Amazon Music, Amazon P Amazon Prime Video, Amazon Web Services
Website:	www.amazon.com (https://business.amazon.com/en/home?ref_=b2b_mcs_SEO_Scores (https://seoscores.org/domain/amazon.com))
Business data:	Google Finance (https://www.google.com/finance?q=AMZN) / Yahoo! Finan (https://finance.yahoo.com/q?s=AMZN) / SEC filings (https://www.sec.gov/cbin/browse-edgar?action=getcompany&CIK=1018724)

All Corporate Locations for Amazon.com, Inc.



EXHIBIT “G”

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(Camden Vicinage)**

CHARLES RITTER, General Administrator and
as Administrator *ad Prosequendum* of
ROCHELLE RITTER, deceased,

Plaintiffs,

v.

ADDY BROTHERS, LLC; JACOB ADDY;
AMAZON.COM, INC.; and JOHN DOE(S)
EMPLOYER (fictitious names),

Defendants.

Civil Action No.:

**ANSWER AND SEPARATE DEFENSES OF DEFENDANTS', ADDY BROTHERS, LLC; JACOB
ADDY; AND AMAZON.COM, LLC, TO PLAINTIFFS' AMENDED COMPLAINT**

Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC (hereinafter referred to as
“Defendants” or “Addy Brothers”), by way of Answer to the Plaintiffs’ Amended Complaint, hereby
states:

FIRST COUNT

1. Defendants are without knowledge or information sufficient to form a belief as to the
truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof
thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the
truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof
thereof is demanded at the time of trial.

3. Denied.

4. Denied.

5. Defendants are without knowledge or information sufficient to form a belief as to the
truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof
thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

SECOND COUNT

Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Denied.

4. Denied.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

thereof is demanded at the time of trial.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

THIRD COUNT

Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Denied.

4. Denied.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby

demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

FOURTH COUNT

1. Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

FIFTH COUNT

Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Defendants are without knowledge or information sufficient to form a belief as to the

truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

SIXTH COUNT

Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Denied.

4. Denied.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

SEVENTH COUNT

Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Denied.

4. Denied.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and

respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

EIGHTH COUNT

Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Denied.

4. Denied.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

NINETH COUNT

1. Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

TENTH COUNT

1. Defendants hereby incorporates their answers to the proceeding paragraphs of the Amended Complaint as if set forth at length herein.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

WHEREFORE, Defendants, Addy Brothers, LLC; Jacob Addy; and Amazon.com, LLC, hereby demand judgment against the Plaintiffs dismissing Plaintiffs' Amended Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiffs for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

SEPARATE DEFENSES

1. The Amended Complaint fails to state a claim upon which relief may be granted, and Defendants reserve the right to move to dismiss.

2. The Amended Complaint is barred by the applicable statute of limitations and/or statute of repose governing such claims.

3. The incidents complained of were caused by third parties over whom Defendants had no control.

4. If Plaintiffs sustained injuries or damages, those injuries or damages were proximately caused by the superseding intervening actions of others.

5. Defendants breached no duty to any party herein.

6. Plaintiffs' claims are barred by the doctrine of laches.

7. Plaintiffs' claims are barred by the doctrine of waiver.

8. Plaintiffs' claims are barred by the doctrine of unclean hands.

9. Plaintiffs' claims are barred by the doctrine of estoppel.

10. Plaintiffs' claims are barred by the doctrine of joint enterprise.

11. Plaintiffs' claims are barred, in whole or in part, by the entire controversy doctrine.

12. Without admitting any liability herein, and without admitting that Plaintiffs have suffered any damages at all, Plaintiffs failed to take reasonable steps to mitigate damages, if any.

13. Defendants complied with all applicable and existing state and federal statutes and regulations and industry standards.

14. Plaintiffs' claims are barred or diminished and reduced by the doctrine of comparative negligence under the New Jersey Comparative Negligence Act, N.J.S.A. 2A:15-5.1 et seq.

15. Plaintiffs' claims are barred or diminished and reduced by the Collateral Source Rule, as set forth in N.J.S.A. 2A:15-97.

16. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs lack the requisite standing to proceed with this litigation.

17. This action is barred, in whole or in part, by Plaintiffs' failure to join a party without whom the action cannot proceed.

18. Plaintiffs' claims are barred, in whole or in part, by Plaintiffs' failure to use a crosswalk and/or obey pedestrian signals and signage as required by N.J.S.A. 39:4-36.

19. Defendants deny any claim for strict liability, if any.

20. Defendants deny any claim for compensatory damages.

21. Defendants deny any claim for punitive damages.

22. Plaintiffs' claims are barred, in whole or in part, by accord and satisfaction.

23. Defendants reserve the right to rely upon any and all defenses as afforded by New Jersey's Wrongful Death Statute, N.J.S.A. 2A:31-4, *et seq.* and/or New Jersey's Survival Act, N.J.S.A. 2A:31-1, *et seq.*

24. Service of process was insufficient and/or improper and Plaintiffs' claims should be dismissed accordingly.

REQUEST FOR STATEMENT OF DAMAGES

1. You are hereby requested and required to furnish to the undersigned within five (5) days, a written statement of the amount of damages claimed.

DEMAND FOR DISCOVERY

Defendants hereby requests that the Plaintiffs answer and respond to the New Jersey Uniform Interrogatories Form (A) within the time prescribed by the New Jersey Rules of Court.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that Marc R. Jones, Esquire, is hereby designated as trial counsel in the above matter.

DEMAND FOR JURY TRIAL

Defendants hereby demand a trial by jury as to all issues.

CERTIFICATION

The matter in controversy is not the subject to any other known action pending in any Court, or of a known or contemplated arbitration proceeding. There are no other parties known who should be joined in this action.

CIPRIANI & WERNER, P.C.



MARC R. JONES, ESQUIRE (NJ#016022001)
Attorneys for Defendants – Addy Brothers, LLC; Jacob Addy;
and Amazon.com, LLC
155 Gaither Drive – Suite B
Mount Laurel, NJ 08054
T: 609-206-8391
mjones@c-wlaw.com

DATED: December 8, 2021